

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Case No. 22-10259-TPA
	:	
Michael Wallace Yochum,	:	
Debtor,	:	Chapter 13
	:	
Michael Wallace Yochum,	:	
Movant,	:	Related to Docket No: 25
	:	
vs.	:	
	:	
Portfolio Recovery Associates, LLC,	:	
	:	
AND	:	
	:	
Ronda J. Winnenour, Esq.,	:	
Chapter 13 Trustee,	:	
Respondents.	:	

**CERTIFICATE OF NO OBJECTION REGARDING DEBTOR'S MOTION TO
AVOID AND CANCEL A JUDGMENT LIEN ON REAL ESTATE
WHICH IMPAIRS EXEMPTIONS OF THE DEBTOR**

The undersigned hereby certifies that, as of the date hereof, no Answer, Objection or other Responsive Pleading to the MOTION TO AVOID AND CANCEL A JUDGMENT LIEN ON REAL ESTATE WHICH IMPAIRS EXEMPTIONS OF THE DEBTOR, filed on August 24, 2022, has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no Answer, Objection or other Responsive Pleading to the Complaint appears thereon. Pursuant to the Notice of Hearing, Objections to the Complaint were to be filed and served no later than September 10, 2022.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Date: September 12, 2022

Respectfully submitted,
/s/ Daniel P. Foster, Esquire
Daniel P. Foster
PA I.D. # 92376
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Attorney for Debtor

CERTIFICATE OF SERVICE

I, the undersigned Paralegal of Foster Law Offices, certify under penalty of perjury that I am more than 18 years of age, and that I served a true and correct copy of the CERTIFICATE OF NO OBJECTION REGARDING DEBTOR'S MOTION TO AVOID AND CANCEL A JUDGMENT LIEN by First-Class Mail, U.S. Postage Paid on the parties below*.

Executed on: September 12, 2022

By: /s/ Kathryn Schwartz _____

Kathryn Schwartz, PARALEGAL
FOSTER LAW OFFICES
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MATRIX

Michael Yochum

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Titusville, PA 16354

Service via U.S. Mail

Portfolio Recovery Associates, LLC

Attn: Bankruptcy

120 Corporate Boulevard

Norfolk, VA 23502

Service via U.S. Mail

Scott & Associates, P.C.

c/o Michael A. Carrucoli, Esq.

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Service via CM/ECF

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Service via CM/ECF